

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

Case Number: 1:23-cv-23858-XXXX

ROBERT SCOT JAMES, individually,
and CORE2000,LLC,

Plaintiff,

v.

HONORS HOLDINGS LLC,

Defendant,

v.

ULTIMATE FITNESS GROUP, LLC
d/b/a ORANGETHEORY FITNESS

Garnishee.

**ULTIMATE FITNESS GROUP, LLC D/B/A ORANGETHEORY FITNESS’
ANSWER TO WRIT OF GARNISHMENT**

Ultimate Fitness Group, LLC, doing business as Orangetheory Fitness (“**Orangetheory**”), by and through its undersigned counsel, comes before the Court and answers the Writ of Garnishment (the “**Writ**”) served by Judgment Creditors Robert Scot James, individually, and CORE2000, LLC (collectively, the “**Judgment Creditors**”) herein on November 13, 2023, and states as follows:

1. At the time of this Answer and at the time of the service of the Writ, and at all points between those times, Orangetheory was not indebted to Honors Holding LLC (“**Honors**”).

2. At the time of this Answer and at the time of the service of the Writ, and at all points between those times, Orangetheory has had no goods, money,

chattels, effects, or other tangible or intangible property of Honors in its possession, custody or control.

3. Orangetheory is unaware of any other person indebted to Honors, or who may have any of the property of Honors in his or her possession or control.

4. Orangetheory hereby demands the immediate payment of \$100.00 from Judgment Creditors pursuant to §77.28, Florida Statutes, for the partial payment of its attorney's fees and costs expended in obtaining representation to respond to the Writ. Orangetheory reserves the right to seek all of its reasonable attorneys' fees and costs pursuant to §77.28, Florida Statutes.

5. These responses are based upon a search of data contained in Orangetheory's centralized customer identification and account information system. That system may not necessarily capture all relevant information concerning Honors' or other accounts.

Dated: December 1, 2023

Respectfully submitted,

/s/ Jeffrey T. Kucera

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was filed electronically in accordance with the local rules and was therefore served electronically on those parties that have properly registered for such electronic service on December 1, 2023, and that a copy was served by electronic mail and U.S. Mail as follows:

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By: /s/ Jeffrey T. Kucera
Jeffrey T. Kucera